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12 *Attorneys for Non-Party Renibus Therapeutics, Inc.*

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MICHAEL PARDI, Individually and On
17 Behalf of All Others Similarly Situated,

18 Plaintiff,

19 v.

20 TRICIDA, INC., and GERRIT KLAERNER,

21 Defendants.

CASE NO. 4:21-cv-00076-HSG

CLASS ACTION

**STIPULATION AND ORDER EXTENDING
TIME FOR NON-PARTY RENIBUS
THERAPEUTICS, INC. TO COMPLY
WITH L.R. 79-5**

Hon. Haywood S. Gilliam, Jr.

1 Lead Plaintiff Jeffrey M. Fiore (“Lead Plaintiff”), Defendants Tricida, Inc. and Gerrit
 2 Klaerner (“Defendants”), and Non-Party Renibus Therapeutics, Inc. (“Renibus”), by and through
 3 their undersigned counsel, hereby stipulate and agree as follows and jointly request that the Court
 4 enter the below Order approving this stipulation.

5 **WHEREAS**, on August 15, 2024, Lead Plaintiff filed his Reply in Support of his Motion
 6 to Certify Class, Appoint Class Representative, and Appoint Class Counsel (“Reply”) (Dkt. 175);

7 **WHEREAS**, in connection with his Reply, Lead Plaintiff filed Exhibits B and C to the
 8 Declaration of Jeffrey C. Block (“Block Declaration”) under provisional seal pursuant to L.R. 79-
 9 5(f) (Dkt. 175);

10 **WHEREAS**, on August 15, 2024, Lead Plaintiff filed an Administrative Motion to
 11 consider whether Exhibits B and C to the Block Declaration should be sealed pursuant to L.R. 79-
 12 5(f) (Dkt. 174);

13 **WHEREAS**, Exhibits B and C to the Block Declaration were produced by the U.S. Food
 14 and Drug Administration (“FDA”) as “CONFIDENTIAL” pursuant to the September 22, 2022
 15 Protective Order (Dkt. 102);

16 **WHEREAS**, pursuant to L.R. 79-5(f)(3), Renibus has until August 22, 2024 to file its
 17 statement and/or declaration supporting sealing of Exhibits B and C to the Block Declaration;

18 **WHEREAS**, Renibus requires additional time to review the sealed information and confer
 19 with the Parties and the FDA as to which portions, if any, of Exhibits B and C to the Block
 20 Declaration should remain sealed;

21 **WHEREAS**, counsel for the Parties have met and conferred and respectfully submit that
 22 good cause exists to continue Renibus’s time to comply with L.R. 79-5(f).

23 **IT IS ACCORDINGLY STIPULATED**, by and between the undersigned counsel for
 24 Renibus and the Parties, that:

25 1. Renibus’s time to comply with L.R. 79-5(f) is continued from August 22, 2024 to
 26 August 29, 2024.

1 Dated: August 21, 2024

Respectfully submitted,

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3 LATHAM & WATKINS LLP

By /s/ Morgan E. Whitworth

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*Attorneys for Defendants Tricida, Inc. and
Gerrit Klaerner*

SIGNATURE ATTESTATION


I, Morgan E. Whitworth, am the ECF User whose identification and password are being used to file the foregoing Stipulation and [Proposed] Order Extending Time for Non-Party Renibus Therapeutics, Inc. to Comply with L.R. 79-5. Pursuant to L.R. 5-1(i)(3) regarding signatures, I, Morgan E. Whitworth, attest that concurrence in the filing of this document has been obtained.

DATED: August 21, 2024

/s/ Morgan E. Whitworth
Morgan E. Whitworth

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 8/21/2024


Hon. Haywood S. Gilliam, Jr.
United States District Judge